

1 KAREN P. HEWITT  
United States Attorney  
2 CAROLINE J. CLARK  
Assistant U.S. Attorney  
3 California State Bar No. 220000  
Office of the U.S. Attorney  
4 880 Front Street, Room 6293  
San Diego, California 92101-8893  
5 Telephone: (619) 557-7491  
Facsimile: (619) 557-5004  
6 E-mail: caroline.clark@usdoj.gov  
7 Attorneys for Defendants  
8  
9

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

11 HAMID REZA HEDAYAT ZADEH,  
12 Plaintiff,  
13 v.  
14 MICHAEL CHERTOFF, Secretary of the  
Department of Homeland Security;  
15 EDUARDO AGUIRRE JR., Director of the  
United States Citizenship and Immigration  
16 Services (CIS); Office of CIS for the County  
of San Diego,  
17 Defendants.  
18

Case No. 07cv2220 JAH (CAB)

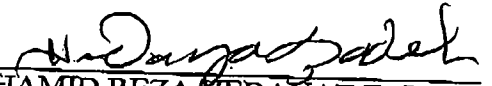
JOINT MOTION TO EXTEND TIME FOR  
FILING OF RESPONSIVE PLEADING

[Fed.R.Civ.P. 6(b)(1)]

20 COME NOW THE PARTIES, Plaintiff Hamid Reza Hedayat Zadeh, and Defendants Michael  
21 Chertoff, et al., by and through their counsel, Karen P. Hewitt, United States Attorney, and Caroline  
22 Clark, Assistant United States Attorney, and hereby jointly move the Court to extend the time for filing  
23 of Defendants' responsive pleading. The parties are working toward an extrajudicial resolution of  
24 Plaintiff's complaint, and the parties have agreed that additional time is required before Defendants'  
25 filing of any responsive pleading in order to pursue resolution of Plaintiff's claims without the  
26 intervention of the Court. In order to address Plaintiff's claims and without waiving Defendants' rights  
27 to defend the causes of actions and allegations, including the right to file any FED. R. CIV. P. 12 motions  
28 to dismiss, the parties jointly request this extension of time. Based upon the foregoing, it is respectfully


1 requested that the Court enter an order, under FED. R. Civ. P. 6(b)(1), expanding the time for the filing  
2 of Defendants' responsive pleading until **June 16, 2008**.

3  
4 DATED:

  
HAMID REZA HEDAYAT ZADEH  
Plaintiff  
04/12/08

5  
6 DATED: *April 14, 2008*

7 KAREN P. HEWITT  
United States Attorney

8  
9   
CAROLINE J. CLARK  
Assistant United States Attorney  
Attorneys for Defendants  
E-Mail: caroline.clark@usdoj.gov